

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
FEB 07 2023
SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON
DEPUTY

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

V.

RANDY DEL MCREYNOLDS,
AMY JO MCREYNOLDS,
MARIAH SARA FOSTER
(a/k/a "Mariah Sara McReynolds"),
DUSTIN DOUGLAS FOSTER, and
JAMIE EDWARDS.

Defendants.

2:23-CR-12-TOR

INDICTMENT

Vios: 18 U.S.C. §§ 1621, 1622,
1623(a), 371
Conspiracy to Commit
Perjury, Suborn Perjury, and
Make False Declarations
Before a Court
(Count 1)

18 U.S.C. § 1623(a)
False Declarations Before a
Court
(Counts 2–5)

The Grand Jury charges:

COUNT 1

1. On or about between March 9, 2021, and June 30, 2021, in the Eastern District of Washington and elsewhere, the Defendants, RANDY DEL MCREYNOLDS, AMY JO MCREYNOLDS, MARIAH SARA FOSTER (a/k/a "Mariah Sara McReynolds"), DUSTIN DOUGLAS FOSTER, and JAMIE

EDWARDS, did unlawfully, knowingly, voluntarily, and intentionally combine, conspire, confederate, and agree with each other and others to commit an offense against the United States, namely to commit perjury, suborn perjury, and make false declarations before a court in violation of 18 U.S.C. §§ 1621, 1622, and 1623(a) in relation to *United States of America v. Randy D. McReynolds*, United States District Court for the Eastern District of Washington Case No. 2:21-CR-00028-WFN.

THE UNLAWFUL OBJECT AND MANNER AND MEANS OF THE CONSPIRACY

2. Through and as part of the conspiracy, the Defendants RANDY DEL MCREYNOLDS, AMY JO MCREYNOLDS, MARIAH SARA FOSTER (a/k/a "Mariah Sara McReynolds"), DUSTIN DOUGLAS FOSTER, and JAMIE EDWARDS conspired and combined in furtherance of the common objective of committing perjury, suborning perjury, and making false declarations before a court by providing false and misleading testimony, and causing others to provide false and misleading testimony, in the matter of *United States v. Randy Del McReynolds*, United States District Court for the Eastern District of Washington Case No. 2:21-CR-00028-WFN.

3. On June 22, 2018, the Defendant RANDY DEL MCREYNOLDS commenced 96-month and 36-month terms of supervised release following convictions under, respectively, United States District Court for the Eastern District of Washington Case Nos. 2:10-CR-00026-WFN and 2:11-CR-00027-WFN.

4. On March 9, 2021, the United States Probation Office for the Eastern District of Washington executed a search of the Defendants RANDY DEL

1 MCREYNOLDS and AMY JO MCREYNOLDS' residence in Spokane,
2 Washington.

3 5. During the search, United States Probation Officer Chris Heinen found a
4 Ruger, model GP 100, .357 Magnum caliber revolver in a backpack located in a
5 bedroom closet. The backpack also contained various rounds of ammunition and a
6 prescription pill bottle with the label made out to "Randy McReynolds."

7 6. During the search, United States Probation Officer P.J. Dennis found various
8 rounds of ammunition in a second backpack located in a hallway closet.

9 7. At all times relevant to this Indictment, the Defendant RANDY DEL
10 MCREYNOLDS was ineligible to possess firearms and ammunition due to an
11 earlier conviction for a crime punishable by imprisonment for a term exceeding
12 one year.

13 8. The Defendant RANDY DEL MCREYNOLDS was arrested following the
14 discovery of the firearm and ammunition.

15 9. On March 10, 2021, a Criminal Complaint was authorized charging the
16 Defendant RANDY DEL MCREYNOLDS with being a felon in possession of a
17 firearm, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

18 10. On March 16, 2021, an Indictment was returned charging the Defendant
19 RANDY DEL MCREYNOLDS with being a felon in possession of a firearm and
20 ammunition, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2). The Defendant
21 RANDY DEL MCREYNOLDS' case was assigned United States District Court
22 for the Eastern District of Washington Case No. 2:21-CR-00028-WFN.

23 11. At all times relevant to this Indictment, the Defendants RANDY DEL
24 MCREYNOLDS and AMY JO MCREYNOLDS were spouses.

1 12. At all times relevant to this Indictment, the Defendant MARIAH SARA
2 FOSTER (a/k/a "Mariah Sara McReynolds") was the daughter of the Defendant
3 RANDY DEL MCREYNOLDS.

4 13. From March 9, 2021 through at least June 30, 2021, the Defendant DUSTIN
5 DOUGLAS FOSTER was married to the Defendant MARIAH SARA FOSTER
6 (a/k/a "Mariah Sara McReynolds").

7 14. From March 9, 2021 through at least June 30, 2021, the Defendant JAMIE
8 EDWARDS was employed with the Defendant MARIAH SARA FOSTER (a/k/a
9 "Mariah Sara McReynolds") at Fieldstone Memory Center in Spokane,
10 Washington.

12 15. On March 29, 2021, in a telephone call placed by the Defendant RANDY
13 DEL MCREYNOLDS from the Spokane County Jail, the Defendant RANDY DEL
14 MCREYNOLDS told the Defendant AMY JO MCREYNOLDS that "I have the
15 answers for this, but it takes four witnesses, you, Mariah, Dustin, and Frank. I can
16 beat this, but it takes three really good actors, and I know you and Mariah are
17 good, but it also takes one more, Dustin, I don't know if he can but he might."

18 16. On April 27, 2021, the Defendant DUSTIN DOUGLAS FOSTER signed a
19 declaration under penalty of perjury which contained the following statements:

20 a. "My name is Dustin Douglas Foster. I am over the age of 18 years and
21 competent to testify."

22 b. "I am Randy McReynold's son in law. At all times material herein, I
23 reside at 1724 West Boone Ave, Spokane, WA."

24 c. "I am the owner of the Ruger, Model GP 100, 357. I also own a 9mm
25 handgun. I purchased the firearm from Mike Anderson. It was my
26 understanding from Mike that his parents passed away and they were
27 the previous owners of the firearm. In addition to purchasing the
28

1 firearm, I also received ammo for the weapon. After I purchased the
2 firearm, I stored it in a green hiking bag in a closet in my home's
3 spare bedroom. I also stored in the same location ammo for my 9mm."

4 d. "Approximately in November, 2020, Amy McReynolds, Randy's
5 wife, came to live with us. She resided in the spare bedroom. She also
6 put a number of her belongings in the closet where I stored the
7 Ruger."

8 e. "In March 2021, Amy wanted to move back with Randy. On March 8,
9 2021, me and a few of my friends, as well as a man named Shane,
10 helped moved Amy's belongings back to Randy's residence. It was
11 during this time that the Ruger was unknowingly placed in Amy's
12 belongings and transported to Randy's home."

13 f. "Shane and I also helped Amy build her bed in the bedroom. All of
14 the smaller items in the room were placed in Amy's closet. I believe it
15 was at this time the Ruger was placed in Amy's closet. Randy was not
16 home at any point of the move."

17 g. "It wasn't until after Randy was arrested that I realized that the
18 weapon federal authorities located in Randy's home was my firearm.
19 Randy had no knowledge that the firearm was in his home. I also
20 believe the 357 and 9mm ammo alleged in the Indictment all belonged
21 to me and was mistakenly transported to Randy's home."

22 17. On June 28, 2021, the trial in the matter of *United States v. Randy Del*
23 *McReynolds*, United States District Court for the Eastern District of Washington
24 Case No. 2:21-CR-00028-WFN, commenced in Spokane, Washington.

25 18. On June 29, 2021, the Defendants AMY JO MCREYNOLDS, MARIAH
26 SARA FOSTER (a/k/a "Mariah Sara McReynolds"), DUSTIN DOUGLAS

1 FOSTER, and JAMIE EDWARDS testified after being called as witnesses by the
2 Defendant RANDY DEL MCREYNOLDS.

3 19. Prior to testifying, the Defendants AMY JO MCREYNOLDS, MARIAH
4 SARA FOSTER (a/k/a “Mariah Sara McReynolds”), DUSTIN DOUGLAS
5 FOSTER, and JAMIE EDWARDS each took an oath that they would testify
6 truthfully.

7 20. The Defendant DUSTIN DOUGLAS FOSTER testified to the following:

- 8 a. That the Defendant DUSTIN DOUGLAS FOSTER had purchased
9 both a .357 revolver and a 9mm pistol from Mike Anderson in
10 February or March 2019;
- 11 b. That the Defendant DUSTIN DOUGLAS FOSTER had met Mike
12 Anderson at a gas station on Division, in Spokane, Washington, and
13 paid him \$450 for both firearms;
- 14 c. That the Defendant DUSTIN DOUGLAS FOSTER’s wife, the
15 Defendant MARIAH SARA FOSTER (a/k/a “Mariah Sara
16 McReynolds”), had accompanied him to meet Mike Anderson;
- 17 d. That neither firearm had come with any ammunition, and that the
18 Defendant DUSTIN DOUGLAS FOSTER had later gotten
19 ammunition for both guns from a friend, Billy;
- 20 e. That the .357 revolver was stored in a green backpack along with
21 some .357 and 9mm ammunition;
- 22 f. That the green backpack also contained some prescription pills the
23 Defendant DUSTIN DOUGLAS FOSTER had gotten from the
24 Defendant RANDY DEL MCREYNOLDS;

- 1 g. That the green backpack with the revolver and ammunition was stored
- 2 on a closet shelf in the spare room of the Defendant DUSTIN
- 3 DOUGLAS FOSTER's home;
- 4 h. That the Defendant DUSTIN DOUGLAS FOSTER's mother-in-law,
- 5 the Defendant AMY JO MCREYNOLDS, had come and stayed with
- 6 them and lived in the spare room where the green backpack was
- 7 stored;
- 8 i. That the Defendant DUSTIN DOUGLAS FOSTER had later helped
- 9 the Defendant AMY JO MCREYNOLDS move back into the
- 10 Defendant RANDY DEL MCREYNOLDS' residence along with the
- 11 Defendant MARIAH SARA FOSTER (a/k/a "Mariah Sara
- 12 McReynolds") and some friends; and
- 13 j. That when the Defendant DUSTIN DOUGLAS FOSTER had heard a
- 14 .357 revolver had been found at the Defendant RANDY DEL
- 15 MCREYNOLDS' house he checked and found that his green
- 16 backpack with his .357 revolver was missing from the spare
- 17 bedroom's closet shelf.

19 21. The Defendant MARIAH SARA FOSTER (a/k/a "Mariah Sara
20 McReynolds") testified to the following:

- 21 a. That the Defendant MARIAH SARA FOSTER (a/k/a "Mariah Sara
- 22 McReynolds") worked at an assisted living memory care facility and
- 23 one of her supervisors was named the Defendant JAMIE EDWARDS;
- 24 b. That the Defendant MARIAH SARA FOSTER (a/k/a "Mariah Sara
- 25 McReynolds") was present when the Defendant DUSTIN DOUGLAS
- 26 FOSTER purchased the .357 revolver and 9mm handgun from a man
- 27 named Mike;

- 1 c. That the .357 revolver was stored in a backpack on the top shelf of the
- 2 closet in their spare room;
- 3 d. That the Defendant MARIAH SARA FOSTER's (a/k/a "Mariah Sara
- 4 McReynolds") mother, the Defendant AMY JO MCREYNOLDS, had
- 5 come to live with them in October or November 2020, and had stayed
- 6 in the spare room;
- 7 e. That the Defendant MARIAH SARA FOSTER (a/k/a "Mariah Sara
- 8 McReynolds") had helped the Defendant AMY JO MCREYNOLDS
- 9 move back into the Defendant RANDY DEL MCREYNOLDS' home
- 10 in March 2021;
- 11 f. That some of the Defendant MARIAH SARA FOSTER's (a/k/a
- 12 "Mariah Sara McReynolds") friends, including the Defendant JAMIE
- 13 EDWARDS, had helped move the Defendant AMY JO
- 14 MCREYNOLDS's belongings back into the Defendant RANDY DEL
- 15 MCREYNOLDS' home;
- 16 g. That following the Defendant RANDY DEL MCREYNOLDS' arrest,
- 17 the Defendants MARIAH SARA FOSTER (a/k/a "Mariah Sara
- 18 McReynolds") and DUSTIN DOUGLAS FOSTER had checked the
- 19 spare bedroom closet and found the green backpack with the .357
- 20 revolver missing; and
- 21 h. That the Defendant MARIAH SARA FOSTER (a/k/a "Mariah Sara
- 22 McReynolds") later spoke to the Defendant JAMIE EDWARDS who
- 23 remembered putting a backpack in a hamper while packing up the
- 24 Defendant AMY JO MCREYNOLDS' belongings in the spare
- 25 bedroom.
- 26
- 27
- 28

1 22. The Defendant AMY JO MCREYNOLDS testified to the following:

2 a. That, following some marital difficulties, the Defendant AMY JO
3 MCREYNOLDS had moved in with the Defendants MARIAH SARA
4 FOSTER (a/k/a “Mariah Sara McReynolds”) and DUSTIN
5 DOUGLAS FOSTER;

6 b. That the Defendant AMY JO MCREYNOLDS had lived in the
7 Defendants MARIAH SARA FOSTER (a/k/a “Mariah Sara
8 McReynolds”) and DUSTIN DOUGLAS FOSTER’s spare bedroom;

9 c. That the Defendant AMY JO MCREYNOLDS recognized the green
10 backpack and had seen it on the top shelf of the spare bedroom closet;

11 d. That in March 2021, the Defendant AMY JO MCREYNOLDS had
12 decided to move back in with the Defendant RANDY DEL
13 MCREYNOLDS, and the Defendants MARIAH SARA FOSTER
14 (a/k/a “Mariah Sara McReynolds”) and DUSTIN DOUGLAS
15 FOSTER and other people moved her belongings back into the
16 Defendant RANDY DEL MCREYNOLDS’ home;

17 e. That the Defendant AMY JO MCREYNOLDS denied later finding a
18 9mm handgun in the Defendant RANDY DEL MCREYNOLDS’s
19 residence and providing it to the Defendant DUSTIN DOUGLAS
20 FOSTER.

21 22. The Defendant JAMIE EDWARDS testified to the following:

23 a. That the Defendant JAMIE EDWARDS had assisted the Defendant
24 MARIAH SARA FOSTER (a/k/a “Mariah Sara McReynolds”) in
25 moving the Defendant MARIAH SARA FOSTER’s (a/k/a “Mariah
26 Sara McReynolds”) mom’s stuff out of the Defendant MARIAH
27

28

SARA FOSTER's (a/k/a "Mariah Sara McReynolds") house on around March 8, 2021;

- b. That the Defendant JAMIE EDWARDS grabbed a green backpack off of the top shelf of the closet and put it in a laundry hamper; and
- c. That the Defendant JAMIE EDWARDS then moved the laundry hamper out of the house to a truck in the backyard.

24. On April 30, 2021, Bureau of Alcohol, Tobacco, Firearms and Explosives Special Agent Michael Northcutt spoke to Mike Anderson over the telephone. Mike Anderson denied having provided any firearms to the Defendant DUSTIN DOUGLAS FOSTER.

25. On April 20, 2022, Bureau of Alcohol, Tobacco, Firearms and Explosives Special Agent Ryan McKone contacted Mike Anderson in Colorado. Mike Anderson denied having provided any firearms to the Defendant DUSTIN DOUGLAS FOSTER.

26. On October 27, 2021, Bureau of Alcohol, Tobacco, Firearms and Explosives Special Agent Michael Northcutt spoke to William “Billy” Montgomery in Spokane, Washington. Montgomery denied providing ammunition to the Defendant DUSTIN DOUGLAS FOSTER. Montgomery stated that he had gone shooting with the Defendant DUSTIN DOUGLAS FOSTER but if he had given the Defendant DUSTIN DOUGLAS FOSTER ammunition it would have been no more than five rounds. Montgomery stated that the Defendant DUSTIN DOUGLAS FOSTER had never showed him any guns or told him that he had gotten any guns.

OVERT ACTS

27. In order to affect the objects of the conspiracy and in furtherance of the conspiracy, the Defendants committed and caused to be committed the following overt acts in the Eastern District of Washington, among others:

- a. On or about March 10, 2021, the Defendant AMY JO MCREYNOLDS provided the Defendant DUSTIN DOUGLAS FOSTER with a 9mm caliber firearm found inside the Defendant RANDY DEL MCREYNOLDS' residence.
- b. On or about between April 13, 2021, and on or about April 27, 2021, the Defendants RANDY DEL MCREYNOLDS and AMY JO MCREYNOLDS drafted, through telephone calls placed by the Defendant RANDY DEL MCREYNOLDS from the Spokane County Jail, the final version of the declaration ultimately signed by the Defendant DUSTIN DOUGLAS FOSTER which falsely and misleadingly represented that:
 - i. the Defendant DUSTIN DOUGLAS FOSTER had purchased the .357 revolver from Mike Anderson;
 - ii. the .357 revolver was stored in a green hiking bag in a closet in the Defendants DUSTIN DOUGLAS FOSTER and MARIAH SARA FOSTER's (a/k/a "Mariah Sara McReynolds") spare bedroom; and
 - iii. the backpack containing the .357 revolver was unknowingly moved to the Defendant RANDY DEL MCREYNOLDS' residence when moving the Defendant AMY JO MCREYNOLDS' belongings.

- c. On or about April 27, 2021, the Defendant DUSTIN DOUGLAS FOSTER signed the declaration finalized by the Defendants RANDY DEL MCREYNOLDS and AMY JO MCREYNOLDS over the Spokane County Jail telephone calls, falsely and misleadingly representing that:
 - i. the Defendant DUSTIN DOUGLAS FOSTER had purchased the .357 revolver from Mike Anderson;
 - ii. the .357 revolver was stored in a green hiking bag in a closet in the Defendants DUSTIN DOUGLAS FOSTER and MARIAH SARA FOSTER's (a/k/a "Mariah Sara McReynolds") spare bedroom; and
 - iii. the backpack containing the .357 revolver was unknowingly moved to the Defendant RANDY DEL MCREYNOLDS' residence when moving the Defendant AMY JO MCREYNOLDS' belongings.
- d. On or about April 28, 2021, the Defendant RANDY DEL MCREYNOLDS, in a telephone call placed by the Defendant RANDY DEL MCREYNOLDS from the Spokane County Jail, told the Defendant AMY JO MCREYNOLDS that the Defendant DUSTIN DOUGLAS FOSTER would, concerning the prescription pill bottle with the label made out to "Randy McReynolds" found in the backpack along with the .357 revolver, "have to tell them it's an old prescription he got from me" and that "he put that medicine in there a long time ago."
- e. On or about between May 10, 2021, and on or about May 17, 2021, the Defendants RANDY DEL MCREYNOLDS, AMY JO

1 MCREYNOLDS, and MARIAH SARA FOSTER (a/k/a "Mariah Sara
2 McReynolds"), through telephone calls placed by the Defendant
3 RANDY DEL MCREYNOLDS from the Spokane County Jail,
4 discussed how the Defendant JAMIE EDWARDS had offered to
5 testify concerning the backpack containing the .357 revolver being
6 moved from the Defendants MARIAH SARA FOSTER (a/k/a
7 "Mariah Sara McReynolds") and DUSTIN DOUGLAS FOSTER's
8 residence into the Defendant RANDY DEL MCREYNOLDS'
9 residence.

10 f. On June 29, 2021, the Defendant DUSTIN DOUGLAS FOSTER
11 falsely and misleadingly testified:

- 13 i. That the Defendant DUSTIN DOUGLAS FOSTER had
14 purchased both a .357 revolver and a 9mm pistol from Mike
15 Anderson in February or March 2019;
- 16 ii. That the Defendant DUSTIN DOUGLAS FOSTER had met
17 Mike Anderson at a gas station on Division, in Spokane,
18 Washington, and paid him \$450 for both firearms;
- 19 iii. That the Defendant DUSTIN DOUGLAS FOSTER's wife, the
20 Defendant MARIAH SARA FOSTER (a/k/a "Mariah Sara
21 McReynolds"), had accompanied him to meet Mike Anderson;
- 22 iv. That neither firearm had come with any ammunition, and that
23 the Defendant DUSTIN DOUGLAS FOSTER had later gotten
24 ammunition for both guns from a friend, Billy;
- 25 v. That the .357 revolver was stored in a green backpack along
26 with some .357 and 9mm ammunition;

- 1 vi. That the green backpack also contained some prescription pills
2 the Defendant DUSTIN DOUGLAS FOSTER had gotten from
3 the Defendant RANDY DEL MCREYNOLDS;
- 4 vii. That the green backpack with the revolver and ammunition was
5 stored on a closet shelf in the spare room of the Defendant
6 DUSTIN DOUGLAS FOSTER's home;
- 7 g. On June 29, 2021, the Defendant MARIAH SARA FOSTER (a/k/a
8 "Mariah Sara McReynolds") falsely and misleadingly testified:
 - 9 i. That the Defendant MARIAH SARA FOSTER (a/k/a "Mariah
10 Sara McReynolds") was present when the Defendant DUSTIN
11 DOUGLAS FOSTER purchased the .357 revolver and 9mm
12 handgun from a man named Mike;
 - 13 ii. That the .357 revolver was stored in a backpack on the top shelf
14 of the closet in their spare room;
 - 15 iii. That following the Defendant RANDY DEL MCREYNOLDS'
16 arrest, the Defendant MARIAH SARA FOSTER (a/k/a "Mariah
17 Sara McReynolds") and the Defendant DUSTIN DOUGLAS
18 FOSTER had checked the spare bedroom closet and found the
19 green backpack with the .357 revolver missing; and
 - 20 iv. That the Defendant MARIAH SARA FOSTER (a/k/a "Mariah
21 Sara McReynolds") later spoke to the Defendant JAMIE
22 EDWARDS who remembered putting a backpack in a hamper
23 while packing up the Defendant AMY JO MCREYNOLDS'
24 belongings in the spare bedroom
- 25 h. On June 29, 2021, the Defendant AMY JO MCREYNOLDS falsely
26 and misleadingly testified:

- i. That the Defendant AMY JO MCREYNOLDS recognized the green backpack and had seen it on the top shelf of the spare bedroom closet.
- i. On June 29, 2021, the Defendant JAMIE EDWARDS falsely and misleadingly testified:
 - i. That, while assisting the Defendant MARIAH SARA FOSTER (a/k/a “Mariah Sara McReynolds”) move the Defendant AMY JO MCREYNOLDS’ belongings, the Defendant JAMIE EDWARDS grabbed a green backpack off of the top shelf of the closet and put it in a laundry hamper; and
 - ii. That the Defendant JAMIE EDWARDS then moved the laundry hamper out of the house to a truck in the back yard.

All in violation of 18 U.S.C. § 371.

COUNT 2

The allegations set forth in paragraphs 1 through 27 of this Indictment are incorporated herein.

On or about June 29, 2021, in the Eastern District of Washington, the Defendant DUSTIN DOUGLAS FOSTER, while under oath as a witness in *United States v. Randy Del McReynolds*, Case No. 2:21-CR-00028-WFN, then being tried before the United States District Court for the Eastern District of Washington, knowingly made false material declarations, to wit: the Defendant DUSTIN DOUGLAS FOSTER gave the following underlined false testimony:

Q: Can you tell the jury, when did you first become the owner of the .357?

A: I purchased it about two years ago. I believe it was February or March of 2019,
and I purchased it along with another firearm as well.

Q: What did you purchase along with this firearm?

1 A: A 9-millimeter Ruger as well.

2 Q: Who did you purchase that from?

3 A: A Mr. Mike Anderson.

4 * * *

5 Q: And did you end up meeting Mr. Anderson somewhere?

6 A: I did. I met him and his wife on Division. I believe it was the Shell at the time.

7 It's right where Division splits, and we did the exchange there with his wife.

8 * * *

9 Q: Is that something you just collected over time, the ammo?

10 A: Yeah. My buddy, a good friend of mine, is an avid collector, so once I told him
11 I had a .357 and the 9, then he had plenty of different kinds of ammo he just threw
12 my way.

13 * * *

14 Q: Which – so did you end up storing the .357 in any type of bag or case?

15 A: Yeah. It was in a hiking backpack of mine.

16 * * *

17 Q: And this is where you stored the .357?

18 A: Yeah.

19 Q: And did you also store ammunition in this bag?

20 A: Yes, and other things. There was clothes, you know, shirts, you know, tank
21 tops, random stuff.

22 * * *

23 Q: Where did you store the green bag and the .357 in your home?

24 A: It stayed in the spare room, which wasn't used very often.

25 * * *

26 Q: And did you store any other items in the green bag?

1 A: Random things. I – some medication, some stomach pills that I had gotten from
2 Mr. McReynolds that I kept in there.

3 * * *

4 Q: What – where did you get the ammunition?

5 A: I got ammunition from my buddy. I don't know if I'm supposed to say his
6 name. My buddy Billy. He's an avid gun collector, has plenty of 9-millimeters,
7 rifles, things like that. And so I was hanging out with him, told him I got that .357
8 and that 9, and so he just threw me some extra ammo he had.

9 All in violation of 18 U.S.C. § 1623(a).

10 COUNT 3

11 The allegations set forth in paragraphs 1 through 27 of this Indictment are
12 incorporated herein.

13 On or about June 29, 2021, in the Eastern District of Washington, the
14 Defendant MARIAH SARA FOSTER (a/k/a "Mariah Sara McReynolds"), while
15 under oath as a witness in *United States v. Randy Del McReynolds*, Case No. 2:21-
16 CR-00028-WFN, then being tried before the United States District Court for the
17 Eastern District of Washington, knowingly made false material declarations, to
18 wit: the Defendant MARIAH SARA FOSTER (a/k/a "Mariah Sara McReynolds")
19 gave the following underlined false testimony:

20 Q: Were you with him when he purchased that .357?

21 A: I was.

22 Q: And do you know who he purchased it from?

23 A: I just know it was a man named Mike.

24 * * *

25 Q: Where was the .357 stored?

26 A: In our closet of our spare bedroom, like up on a top shelf.

1 * * *

2 Q: What type of bag was it stored in?

3 A: Just a backpack.

4 * * *

5 Q: And at any time, did you talk with Ms. Edwards about what happened?

6 A: Yeah. I had talked to everybody that had been moving the items, just to see if
7 anybody had any knowledge because I hadn't moved it and Dustin hadn't moved
8 it, and our roommate didn't know, couldn't remember if he did or not, and when I
9 had talked to Jamie, she remembered putting a backpack in with the other school
10 items, and so we kind of talked about it and tried to figure out if it was the same
11 one or not.

12 Q: And you determined it was the same green bag that had been placed in the
13 hamper?

14 A: Yes.

15 All in violation of 18 U.S.C. § 1623(a).

16 COUNT 4

17 The allegations set forth in paragraphs 1 through 27 of this Indictment are
18 incorporated herein.

19 On or about June 29, 2021, in the Eastern District of Washington, the
20 Defendant AMY JO MCREYNOLDS, while under oath as a witness in *United*
21 *States v. Randy Del McReynolds*, Case No. 2:21-CR-00028-WFN, then being tried
22 before the United States District Court for the Eastern District of Washington,
23 knowingly made false material declarations, to wit: the Defendant AMY JO
24 MCREYNOLDS gave the following underlined false testimony:

25 Q: So you mentioned that you – when you lived in Mariah's guest bedroom, you
26 noticed a green backpack, is that right?

1 A: Yeah. And several other things.

2 All in violation of 18 U.S.C. § 1623(a).

3 COUNT 5

4 The allegations set forth in paragraphs 1 through 27 of this Indictment are
5 incorporated herein.

6 On or about June 29, 2021, in the Eastern District of Washington, the
7 Defendant JAMIE EDWARDS, while under oath as a witness in *United States v.*
8 *Randy Del McReynolds*, Case No. 2:21-CR-00028-WFN, then being tried before
9 the United States District Court for the Eastern District of Washington, knowingly
10 made false material declarations, to wit: the Defendant JAMIE EDWARDS gave
11 the following underlined false testimony:

12 Q: And you indicated that you pulled some items out of the closet?

13 A: Yeah. So she had a laundry basket. I figured everything that was in there was
14 ready to go, so I grabbed the laundry basket. I grabbed a couple of bags. One bag
15 from a top shelf in the closet, put it in the basket, moved that out, and then I also
16 moved out a couple white trash bags.

17 Q: I'm going to show you a green bag. Does this bag look familiar?

18 A: Yes.

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 Q: And why does it look familiar?

2 A: Because that's the one I grabbed.

3 All in violation of 18 U.S.C. § 1623(a).

4 DATED this 7th day of February, 2023.

5

6 A TRUE BILL

7

8

9

10

11

Vanessa Waldref

12 Vanessa R. Waldref
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